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By **February 10, 2022**, the parties shall submit a supplemental letter stating (i) whether the parties have produced all responsive documents currently in their possession other than documents related to the legacy companies, (ii) if not, the number of responsive documents currently in their possession awaiting production, (iii) the names and roles of any witnesses to be deposed, (iv) dates for the depositions of those witnesses and (v) any interim discovery deadlines the parties have set, such as deadlines for interrogatories or requests to admit.

VIA ECF

Honorable Lorna G. Schofield
Thurgood Marshall United States Courthouse
Southern District of New York
40 Foley Square
New York, NY 10007

Dated: February 4, 2022
New York, New York



LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Re: *Jean Junior Jacques v. Imperial Parking (U.S.), Inc., et al.*
Case No.: 1:21-cv-07102 (LGS) (KHP)

Dear Judge Schofield:

We represent the Defendants in the above-referenced matter and write to respectfully request a thirty (30) day extension of the current February 25, 2022 fact discovery deadline, through and including March 28, 2022. Pursuant to Your Honor's Individual Rules and Procedures, Section (I)(B)((2): (1) the original fact discovery deadline date is February 25, 2022 and the parties now seek an extension of the deadline through and including March 28, 2022; (2-3) there have been no prior requests for an extension of the fact discovery deadline; and (4) Plaintiff's counsel consents to this request.

Defendants timely responded to Plaintiff's initial discovery requests, including producing relevant documents in their possession. However, because the companies named in this lawsuit are "legacy companies"—i.e. businesses that were acquired in the middle of the limitations period—in conjunction with the continued staffing shortages and limitations caused by the pandemic, the record gathering process has taken far longer than in a typical case. Specifically, there remain potentially relevant records stored in other physical locations outside of the parking garages where Plaintiff alleges to have worked. This includes hard copies of potentially responsive documents located in boxes in Canada.

Defendants are actively working with the legacy companies (the former operators of the garages at issue) to uncover all such additional records for potential production to Plaintiff

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should they fall within the scope of his document requests. Through this fact discovery deadline extension request, the parties seek to ensure that Defendants have time to locate and produce the full extent of relevant records before the close of discovery so that both parties can properly evaluate the scope of Plaintiff's claims and conduct depositions using such records thereafter. The parties make this request now, well in advance of the current February 25, 2022 deadline, in an effort to avoid an eleventh-hour extension request and to proactively demonstrate to the Court that the parties are not sitting idly by but rather diligently working on completing discovery in as efficient and timely a manner as possible.

Based on the foregoing, the parties respectfully request the Court grant an extension of the current February 25, 2022 fact discovery deadline through and including March 28, 2022.

Respectfully submitted,
JACKSON LEWIS P.C.

Adam S. Gross

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cc: Counsel for all Parties (via ECF)